

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	CR No.: 04-10248-RCL
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)	
V.)	
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)	
CHRISTOPHER ALVITI,)	
Defendant)	

DEFENDANT'S EMERGENCY MOTION TO CONTINUE SENTENCING

NOW COMES, Christopher Alviti, the Defendant in the above-captioned indictment and moves that his change of plea hearing be continued from Thursday, December 8, 2005 to a date either before January 9, 2006 or after January 23, 2006.

In support of this motion, Counsel for Defendant states the following:

1. Counsel for the Defendant believed that the government was going to request a continuance of sentencing in order for the government to complete defendant's cooperation. Accordingly, counsel has not yet submitted a sentencing memorandum or provided the Court with sentencing materials related to his gambling addiction.
2. Additional time is needed to obtain and present these materials.
3. As far as the defendant knows he has not yet completed his cooperation with the government so that he can make a 5K1 recommendation.

THEREFORE, Defendant, for the foregoing reasons, seeks to continue his sentencing date from Thursday, November 8, 2005 to a date sometime before January 9, 2006 or after January 23, 2006.

Respectfully submitted;
CHRISTOPHER ALVITI
By his Attorney;

Dated: December 5, 2005

/s/ John H. LaChance
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